

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**AURELIUS CAPITAL PARTNERS, LP
and AURELIUS CAPITAL MASTER, LTD.,**

Plaintiffs,

- against -

THE REPUBLIC OF ARGENTINA,

Defendant.

**AURELIUS CAPITAL PARTNERS, LP
and AURELIUS CAPITAL MASTER, LTD.,**

Plaintiffs,

- against -

THE REPUBLIC OF ARGENTINA,

Defendant.

(captions continue on inside cover)

CERTIFICATION OF PHILIPPE ZIMMERMAN

-----X	:	
BLUE ANGEL CAPITAL I LLC,	:	
	:	07 Civ. 2693 (TPG)
Plaintiff,	:	
	:	
- against -	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----X	:	
AURELIUS CAPITAL MASTER, LTD. and ACP	:	
MASTER, LTD.,	:	09 Civ. 8757 (TPG)
	:	
Plaintiffs,	:	
	:	
- against -	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----X	:	
AURELIUS CAPITAL MASTER, LTD. and ACP	:	09 Civ. 10620 (TPG)
MASTER, LTD.,	:	
	:	
Plaintiffs,	:	
	:	
- against -	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----X	:	
AURELIUS OPPORTUNITIES FUND II, LLC and	:	10 Civ. 1602 (TPG)
AURELIUS CAPITAL MASTER, LTD.,	:	
	:	
Plaintiffs,	:	
	:	
- against -	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----X	:	

-----X		
AURELIUS OPPORTUNITIES FUND II, LLC and	:	
AURELIUS CAPITAL MASTER, LTD.,	:	10 Civ. 3507 (TPG)
	:	
Plaintiffs,	:	
	:	
- against -	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----X		
AURELIUS OPPORTUNITIES FUND II, LLC and	:	10 Civ. 3970 (TPG)
AURELIUS CAPITAL MASTER, LTD.,	:	
	:	
Plaintiffs,	:	
	:	
- against -	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----X		
AURELIUS CAPITAL MASTER, LTD. and AURELIUS	:	10 Civ. 4101 (TPG)
OPPORTUNITIES FUND II, LLC,	:	
	:	
Plaintiffs,	:	
	:	
- against -	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----X		
BLUE ANGEL CAPITAL I LLC,	:	10 Civ. 4782 (TPG)
	:	
Plaintiff,	:	
	:	
- against -	:	
	:	
REPUBLIC OF ARGENTINA,	:	
Defendant.	:	
-----X		

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AURELIUS CAPITAL MASTER, LTD. and AURELIUS	:	10 Civ. 8339 (TPG)
OPPORTUNITIES FUND II, LLC,	:	
	:	
Plaintiffs,	:	
	:	
- against -	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----	X	

PHILIPPE ZIMMERMAN hereby certifies:

1. I am a member of Moses & Singer LLP, attorneys for non-parties Deutsche Bank AG New York Branch, Deutsche Bank Americas Holding Corp. (“DBAHC”), Deutsche Bank Securities Inc. (“DBSI”), Deutsche Bank Trust Company Americas (“DBTCA”) and Taunus Corporation (“Taunus”) (collectively, the “Non-Party Deutsche Bank Entities”). I submit this declaration in further support of the Non-Party Deutsche Bank Entities’ Cross-Motion to Quash the Subpoenas Served on Non-Party Deutsche Bank Entities (the “Motion to Quash”).

2. Attached hereto as Exhibit A is a true and correct copy of the Discovery Order issued in *NML Capital, Ltd. v. Republic of Arg.*, No. C 12-80185 JSW (MEJ), 2013 WL 65521 (N.D.Cal. Feb 21, 2013). Objections to the Discovery Order are currently pending before the court.

3. Attached hereto as Exhibit B is a true and correct copy of the Decision issued in *Global Tech., Inc. v. Royal Bank of Can.*, 34 Misc. 3d 1209(A), 2012 N.Y. Slip Op. 50023(U) (Sup. Ct. New York County 2012).

4. Attached hereto as Exhibit C is a true and correct copy of the Decision issued in *Samsun Logix Corp. v. Bank of China*, 31 Misc. 3d 1226(A), 929 N.Y.S. 2d 202 (Sup. Ct. New York County 2011),

4. Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 21, 2013 at New York, New York

/s/ Philippe Zimmerman
PHILIPPE ZIMMERMAN